

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA §  
§  
v. § 3:15-cr11-01  
§  
DENNIS P.M. HUGHES §

**HUGHES' NOTICE OF CASES  
WHERE COURTS HAVE ALLOWED DEFENDANTS,  
WHO ARE SIMILARLY SITUATED TO HUGHES,  
TO WITHDRAW THEIR PLEAS**

Dennis P.M. Hughes, through Neal Davis, files this notice of cases where district courts have allowed defendants to withdraw their pleas, in the same sting operation involved in Hughes' case, after they pled but before they were sentenced, showing specifically:

1. Since Hughes filed and argued his motion to withdraw his plea, which is still pending, courts across the country are granting the motions of defendants who are similarly situated to Hughes.
2. At least two courts have allowed plea withdrawal *on the exact same basis* that Hughes seeks to withdraw his plea. In these cases, the government has opposed plea withdrawal *on the same grounds* as those that AUSA Sherry Zack is urging in Hughes' case. Hughes would urge this Court to review the pleadings and ruling in these cases. These

cases include:

--U.S. v. Lorente; CR15-00274-RJB / Western District of Washington. Defendant's motion, government's reply, and order are attached as an Appendix.

--U.S. v. Lesan; CR15-00387-RJB / Western District of – Washington. Defendant's motion, government's reply, and order are attached as an Appendix.

3. Further, plea withdrawal was allowed in U.S. v. Acevedo-Lemus, CR15-00137-CJC / California Central District. The court's order is attached as an Appendix.

4. Undersigned has searched and is *cannot find a single case* where a defendant, who is similarly situated to Hughes, has moved to withdraw his plea before sentencing but been denied.

Respectfully submitted,

NEAL DAVIS LAW FIRM, PLLC

/s/

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Defendant's lawyer

**CERTIFICATE OF SERVICE**

I certify that copy of this notice has been sent to the Assistant United States Attorney on July 31, 2016, via PACER/ECF filing.

/s/

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Neal Davis